

### **REMARKS**

Applicants thank the Examiner for the thorough consideration given the present invention. Claims 1-13 are pending in the present application. Claims 1-11 and 13 are amended by this response. Claims 1, 12, and 13 are independent claims.

### **Claim Amendments**

Applicants respectfully submit that the amendment to independent claim 1 moves claim limitations previously present in dependent claim 5 into independent claim 1 and does not otherwise change the scope or subject matter of independent claim 1.

### **35 U.S.C. § 102 Rejection – Komatsu**

Claims 1-4 and 11-13 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Japanese Patent Application 2000-022978 to Komatsu et al. (hereafter “Komatsu”). Insofar as it pertains to the presently pending claims, this rejection is respectfully traversed.

### **Claim 1**

With respect to amended independent claim 1, the Office Action asserts that Komatsu teaches a color gamut compressor that “acquires both a chromaticity range indicating said color reproduction characteristics corresponding to a hue of the input image signal, and a chromaticity range indicating said color reproduction characteristics corresponding to the hue of the image data converted by said color corrector based on the data describing the color reproduction characteristics.” In explaining this assertion the Office action states that the process of determining hue information from image data that already underwent lightness conversion and lightness compression (Para 0006) is regarded as conceptually the same as acquiring both “a chromaticity range indicating said color reproduction characteristics corresponding to a hue of the input image signal, and a chromaticity range indicating said color reproduction characteristics corresponding to the hue of the image data converted by said color corrector based on the data describing the color reproduction characteristics” as required by independent

claim 1. Assuming, *in arguendo*, that this assertion is correct, it is still not sufficient to teach or suggest doing it twice by citing a reference that only teaches doing it once.

Applicants respectfully submit that even if Komatsu does teach the claim limitation of “acquiring a chromaticity range indicating said color reproduction characteristics corresponding to a hue of [image data],” Komatsu only teaches doing this once and to only one type of image data. Independent claim 1 requires that this hue-dependent chromaticity range acquisition be performed twice, each time on a different set of data. Applicants therefore respectfully submit that Komatsu fails to teach or suggest a gamut compressor that “acquires both a chromaticity range indicating said color reproduction characteristics corresponding to a hue of the input image signal, and a chromaticity range indicating said color reproduction characteristics corresponding to the hue of the image data converted by said color corrector based on the data describing the color reproduction characteristics.” as required by independent claim 1.

#### Claim 13

Applicants respectfully submit that amended independent claim 13 also recites the limitation of a gamut compressor that “acquires both a chromaticity range indicating said color reproduction characteristics corresponding to a hue of the input image signal, and a chromaticity range indicating said color reproduction characteristics corresponding to the hue of the image data converted by said color corrector based on the data describing the color reproduction characteristics.” Applicants respectfully submit that independent claim 13 is patentable over Komatsu for the same reasons as stated with respect to independent claim 1.

#### Claim 12

With respect to independent claim 12, the Office Action asserts that Komatsu teaches converting the saturation of an input image based on “color adjustment data describing both a hue to be saturation-converted and an amount of adjustment.” Komatsu teaches that saturation conversion is done using “the lightness corresponding to the highest saturation for every hue of an image output device.” (Para 0006). Hue and lightness are not the same, and although the

lightness is determined from the hue, it is determined from the hue at full saturation, meaning that it does not contain data about the amount of saturation adjustment required. Applicants therefore respectfully submit that Komatsu does not teach saturation conversion based on "color adjustment data describing both a hue to be saturation-converted and an amount of adjustment" as required by independent claim 12.

#### Claims 2-4, 11

Applicants respectfully submit that claims 2-4 and 11 are allowable at least by virtue of their dependency from independent claim 1. Applicants submit that the arguments made with respect to independent claim 1 apply equally to all claims depending therefrom.

#### Reconsideration

At least for the above reasons, Applicants respectfully submit that Komatsu does not teach all the claim limitations of independent claims 1, 12, and 13 and all claims depending therefrom. Applicants therefore respectfully request reconsideration and withdrawal of this rejection.

#### 35 U.S.C. § 103 Rejections

Claims 5-7 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Komatsu in view of Iida (U.S. 2003/0164968)[hereinafter "Iida"].

Claim 8 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Komatsu in view of Iida, Shimada (U.S. 2002/0039106)[hereinafter "Shimada"], and Schwartz et al. (U.S. Patent 5,999,703)[hereinafter "Schwartz"].

Claims 9-10 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Komatsu in view of Ogatsu et al. (U.S. Patent 2002/0029715)[hereinafter "Ogatsu"].

Applicants respectfully submit that claims 5-10 are allowable at least by virtue of their dependency from independent claim 1. Applicants further submit that none of Iida, Schwartz, or

Ogatsu are relied upon in the Office Action to remedy the above-identified defects in the teachings of Komatsu, nor can they properly be relied upon for this purpose. Accordingly, reconsideration and withdrawal of these rejections is respectfully requested.

### CONCLUSION

In view of the above remarks, it is believed that the claims are allowable.

Should there be any outstanding matters that need to be resolved in the present application; the Examiner is respectfully requested to contact Michael K Mutter, Reg. No. 29,680 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§ 1.16 or 1.14; particularly, extension of time fees.

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Respectfully submitted,

By 

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